

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

TUA HELP SAVE EAST CLEVELAND
PROJECT,

vs.

XEROX CORPORATION, ET AL.

Plaintiff,

Defendants.

CASE NO.:

JUDGE:

NOTICE OF REMOVAL

Defendants Xerox Corporation, c/o CEO Ursula M. Burns and Director Kevin Lafeber (collectively, "Xerox")¹ and American Traffic Solutions, fka ATS, and CEO James D. Tuton and Executive Vice President Adam E. Tuton (collectively, "ATS") (Xerox and ATS will collectively be referred to as "Defendants") respectfully represent to this Court as follows:

1. Plaintiff TUA Help Save East Cleveland Project aka Pastor A. J. Thompson ("Plaintiff"), commenced an action against Xerox and ATS in Cuyahoga County, Ohio, Court of Common Pleas, Case No. CV-14-824122, by filing a Complaint on March 24, 2014 and causing

¹ Plaintiff improperly named Xerox Corporation as Defendant. The proper Defendant which operates the speeding and red light cameras for the City of Cleveland pursuant to a contract is Xerox State & Local Solutions, Inc. Moreover, it is unclear whether Plaintiff is attempting to sue individual officers and directors of Xerox and ATS or is merely identifying them as persons to accept service. Despite their misjoinder, the individuals likewise consent to this removal.

Summonses to be issued, copies of which are collectively attached as Exhibit A. Plaintiff's Complaint also identifies the following cities and clerks of court as "joinders": City of Cleveland c/o Mayor Frank G. Jackson, Cleveland Clerk of Court c/o Earle B. Turner, City of East Cleveland c/o Mayor Gary Norton, Jr., and East Cleveland Municipal Court c/o Wendy Howard.² These "joinder" parties are not named as defendants. Nevertheless, they consent to and join this Notice of Removal. Plaintiff filed a Notice of Amendment to the Complaint and a separate jury demand on April 16, 2014, a copies of which are attached as Exhibits B and C, respectively. He included Sam Jodka as a "joined plaintiff" and also named as additional defendants the members of the City of Cleveland Law Department. These new defendants consent to and join in this Notice of Removal.

2. Defendant ATS was served on March 31, 2014. Defendant Xerox has not yet been served. City of Cleveland, Cleveland Clerk of Court, City of East Cleveland, East Cleveland Municipal Court were served on March 28, 27, 27, and 27, 2014, respectively. The newly named members of the City of Cleveland Law Department have not yet been served.

3. On April 3, 2014, the City of Cleveland filed a Motion for More Definite Statement, a copy of which is attached hereto as Exhibit D. On April 16, 2014, Plaintiff filed a Motion to Deny City of Cleveland's Motion for More Definite Statement, a copy of which is attached hereto as Exhibit E. By Journal Entries dated April 17 and 18, 2014 (Exhibits F and G, respectively), the Common Pleas Court granted Cleveland's Motion for More Definite Statement and denied Plaintiff's motion. On April 16, 2014, Plaintiff also filed a Motion for Injunction, a

² Improperly-denominated parties, "Cleveland Clerk of Courts" and "East Cleveland Municipal Court" are not *sui juris* and not proper parties at law. See, e.g., *Cuyahoga Falls v. Robart*, 58 Ohio St.3d 1, 567 N.E.2d 987 (1991); *State of Ohio, ex rel. Cleveland Municipal Court v. Cleveland City Council*, 34 Ohio St.2d 120, 296 N.E.2d 544 (1973).

copy of which is attached hereto as Exhibit H. By Journal Entry dated April 17, 2014 (Exhibit I), the Common Pleas Court denied the Motion for Injunction. Also on April 16, 2014, joinder parties Peace in the Hood and Black on Black Crime, Inc. filed their Answers, copies of which are attached as Exhibits J and K, respectively. The Common Pleas Court scheduled a telephonic case management conference for May 5, 2014 at 11 a.m. Plaintiff filed a Motion on April, 16, 2014, a copy of which is attached as Exhibit L, to require live appearances of the parties at the case management conference. The Common Pleas Court denied this motion by journal entry dated April 18, 2014, copy attached as Exhibit M. No further pleadings, process, or orders have been served, and no further proceedings have been had in the Common Pleas Court action.

4. This action is removable from state court to federal court on the grounds that Plaintiff alleges one or more claims: (1) “arising under the Constitution, laws, or treaties of the United States”; 28 U.S.C. § 1331; (2) seeking “[t]o redress the deprivation, under color of any State law, statute, ordinance, regulation, custom or usage, of any right, privilege or immunity secured by the Constitution of the United States or by any Act of Congress providing for equal rights of citizens or of all persons within the jurisdiction of the United States”; 28 U.S.C. § 1331; and/or (3) seeking “[t]o ... secure equitable or other relief under any Act of Congress providing for the protection of civil rights” 28 U.S.C. § 1343(a)(4).

5. Among other things, the Complaint alleges that Xerox and ATS violated Plaintiff’s civil rights and due process rights under the U.S. Constitution. (Complaint ¶¶ 1, 13). Plaintiff seeks redress in the form of (1) an injunction to deactivate and or remove all of Xerox’s and ATS’s Automated Camera Civil Traffic Enforcement Systems and devices that issue traffic citations (Complaint ¶ 1), and (2) restitution payments to poor and minority residents of the Cities of East Cleveland and Cleveland. (Complaint ¶ 15).

6. Xerox and ATS deny all of the allegations in the Complaint. Nevertheless, because the issues raised directly implicate questions of federal law, removal of all federal claim(s) and any pendent state claims is appropriate under 28 U.S.C. § 1441, 28 U.S.C. § 1443, and/or 28 U.S.C. § 1367.

7. As noted above, the parties identified as defendants, Xerox and ATS, as well as the cities of Cleveland, East Cleveland and their respective clerks of court which are identified as “joinders,” as well as the new-party defendants members of the City of Cleveland Law Department, have consented to removal. Plaintiff also improperly joined several civic associations as additional “joinders”: Black on Black Crime Inc., Peace in the Hood, Coalition for a Better Life, Oppressed Peoples Nation, and Cleveland Branch NAACP (collectively, “Joinder Associations”). Defendants have not sought or obtained the Joinder Associations’ consent to removal. However, the Joinder Associations consent is not necessary because their interests are aligned with Plaintiff’s interests, not Defendants, and/or if the Joinder Associations are considered “defendants” rather than joinder plaintiffs, they are nominal, formal, fraudulently and/or improperly joined defendants whose consent is not necessary.³

8. Formal or unnecessary parties are not included as “parties in interest” and cannot prevent the removal of an action to federal court. *Barrientos v. UT-Battelle, LLC* 284 F. Supp. 2d 908 (S.D. Ohio 2003). Although generally the “rule of unanimity” requires that all defendants join in the removal petition (*Loftis v. UPS, Inc.*, 342 F.3d 509, 516 (6th Cir.2003) (noting that the rule is derived from 28 U.S.C. § 1446), the rule of unanimity applies only to those “defendants

³ Plaintiff’s Complaint implies that Cleveland, East Cleveland, East Cleveland Municipal Court, and Cleveland Clerk of Court also have interests aligned with Plaintiff against Xerox and ATS. This is obviously not true since the camera vendors can only provide service for the cities pursuant to the camera ordinances enacted by the cities and pursuant to contract with the cities. Regardless, the cities and court clerks recognize their interest with the camera vendor defendants as adverse to Plaintiff and consent to this removal.

who have been served or otherwise properly joined in the action.” *Brierly v. Alusuisse Flexible Packaging, Inc.*, 184 F.3d 527, 533 n. 3 (6th Cir. 1999) (emphasis added). In line with this authority, it is only the genuine defendants whose consent to removal is required; not those who are nominal, formal, or fraudulently joined. Wright, Miller & Cooper, 14C *Federal Practice & Procedure: Jurisdiction* § 3731, at 270-271 (3d ed. 1998).

9. As the Fifth Circuit stated, “application of [the rule of unanimity] to improperly joined or fraudulently joined parties would be nonsensical, as removal in those cases is based on the contention that no other proper defendant exists.” *Jernigan v. Ashland Oil*, 989 F.2d 812, 815 (5th Cir. 1993); see also *United Computer Sys. v. AT&T Info. Sys.*, 298 F.3d 756, 762 (9th Cir. 2002); *Millennium Chems., Inc. v. Lumbermens Mut. Cas. Co.*, 2001 U.S. Dist. WL 36515998 (N.D. Ohio 2001) (accepting defendant's assertion that because non-diverse defendants were fraudulently joined, “their consent was not required to remove [the] action.”).

10. “A defendant is nominal if there is no chance he will be held liable.” *Miami Valley Hosp. v. Community Ins. Co.*, 2006 WL 2252669 (S.D. Ohio 2006) citing *Shaw V. Dow Brands, Inc.* 994 F.2d 364 (7th Cir. 1993). Fraudulent joinder occurs when the non-removing party joins a party against whom there is no colorable cause of action. *Saginaw Hous. Commn. v. Bannum, Inc.*, 576 F.3d 620 (6th Cir. 2009).

11. Additionally, where a party “has been impleaded as a defendant because of his refusal to join in the suit or to take other necessary action, but it appears that the real interest of such defendant is on the side of the complainant, and that he is not in actual antagonism to the complainant, or acting adversely to him in subservience to some illegal or fraudulent purpose (*Doctor v. Harrington*, 196 U.S. 579 (1905); *Venner v. Great Northern Ry. Co.*, 209 U.S. 24, 28 (1908)), or in good faith opposed to the bringing of the suit on account of its supposed injurious

effects on his own interests (*Chicago v. Mills*, 204 U.S. 321 (1906)), such defendant, although refusing to join in the suit or take other action, is nevertheless, in the absence of such antagonism or opposition, to be realigned upon the same side of the controversy with the complainant, in accordance with his real interest. . . .” See *Stephens v. Smartt*, 172 F. 466, 471-72 (C.C.E.D. Tenn. 1909).

12. The Complaint specifically acknowledges that the Joinder Associations’ interests are aligned with Plaintiff’s, as paragraph fourteen of the Complaint states:

it is [the Joinder Parties’] responsibility to be joind (sic) Plaintiffs and/or assume this action to make this constitutional again. Moreover all named joinders are also necessary to be Joined Plaintiffs in this case due to the nature of the duty to the Office and to the responsibility to their individual organizational mission statements. And if they do not answer to the call of duty as joinded Plaintiffs they are to become joinded as Defendants in this case in accordance with Ohio Rule of Civil Procedure 19.A.

Complaint ¶ 14.

13. Nothing in the Complaint alleges that the Joinder Associations had any role in the automated camera civil traffic enforcement systems, committed any statutory or constitutional violations, or injured Plaintiff in any way. Therefore, if considered defendants, the Joinder Associations are nominal defendants and/or fraudulently joined because there is no reasonable basis for predicting that the Joinder Associations will be held liable. Moreover, pleadings and motions filed subsequent to the original Complaint indicate that the Joinder Associations are meant to be plaintiffs, not defendants.

14. Accordingly, consent of the Joinder Associations to remove this action is not necessary. Defendants have all consented to removal, and therefore all necessary parties have consented to removal.

15. This Notice of Removal is timely because it is filed within thirty (30) days from the date Defendants received a copy of the Complaint. 28 U.S.C. § 1446(b).

16. As required by 28 U.S.C. § 1446(d), written notice of the filing of this Notice of Removal is being filed this day with the Clerk of the Court of Common Pleas, Cuyahoga County, Ohio.

17. By filing this Notice of Removal, Defendants do not waive, and fully reserve, all defenses they may have, including but not limited to, failure to state a claim upon which relief may be granted.

18. Written notice of this Notice of Removal is being provided to Plaintiff by service of this document on Plaintiff.

19. Defendants respectfully request that the United States District Court for the Northern District of Ohio, Eastern Division, accept this Notice of Removal and that it assume jurisdiction of this cause and issue such further orders and processes as may be necessary to bring before it all parties necessary.

Respectfully submitted,

/s/ Richard S. Gurbst

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Attorneys for City of Cleveland,
Cleveland Clerk of Court, and members of the
City of Cleveland Law Department

CERTIFICATE OF SERVICE

A copy of this Notice of Removal was filed electronically on April 21, 2014. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system. In addition, a copy of the foregoing Notice of Removal was sent via regular U.S. Mail, postage pre-paid, on April 21, 2014 to:

Plaintiff

TUA Help Save East Cleveland Project
(AKA) Pastor, A.J. Thompson
10801 Union Avenue
Cleveland, Ohio 44105

Joinder Associations

Black on Black Crime Inc.
c/o Founder, Art McKoy
14660 Euclid Avenue
East Cleveland, Ohio 44112

Oppressed Peoples Nation
c/o Patricia Rowell
14100 Lakeshore Blvd., Apt. 204
Cleveland, Ohio 44110

Peace in the Hood, and
The Coalition for A Better Life
c/o CEO, Khalid Samad
P.O. Box 27465
Cleveland, Ohio 44127

Cleveland Branch NAACP
c/o Rev. Hilton O. Smith, Pres.
7100 Euclid Avenue
Cleveland, Ohio 44103

/s/ Chris Bator

Chris Bator

Counsel for Defendant
Xerox Corporation

**COURT OF COMMON PLEAS
CUYAHOGA COUNTY, OHIO**

JUDGE:

**TUA HELP SAVE EAST CLEVELAND PROJECT
(AKA) PASTOR, A.J. THOMPSON
10801 UNION AVENUE
CLEVELAND, OHIO 44105
(PLAINTIFF)**

CASE NO:

VS

**XEROX CORPORATION
C/O CEO, URSULA M. BURNS
AND DIR. KEVIN LAFEVER
45 GLOVER AVENUE
NORWALK, CT 06856-4505
(DEFENDANT)**

**AMERICAN TRAFFIC SOLUTIONS
aka: ATS, AND CEO JAMES D. TUTON
AND, EXE V P ADAME E. TUTON
1330 W. SOUTHERN AVENUE
TEMPLE, AZ. 85282
(DEFENDANT)**

**BLACK ON BLACK CRIME INC
C/O FOUNDER, ART MCKOY
14660 EUCLID AVENUE
EAST CLEVELAND, OHIO 44112
(JOINDER)**

**COMPLAINT FOR DE-ACTIVATION
AND/OR REMOVAL ALL UNCONSTITUT-
IONAL AUTOMATED CAMERA CIVIL
TRAFFIC ENFORCEMENT SYSTEMS
IN THE CITIES OF CLEVELAND OHIO
AND THE CITY OF EAST CLEVELAND OH
AND
FOR DEFENDANT TO PAY RESTITUTION
FOR DAMAGES FOR HARDSHIP/ DETER-
ANCE OF BUSINESS AND OPPRESSION
CAUSED BY DEFENDANTS TO PLAINTIFF
AND TO POOR AND MINORITY RESIDENTS
IN THESE CITIES**

PEACE IN THE HOOD, AND
THE COALITION FOR A BETTER LIFE
C/O CEO, KHALID SAMAD
YORK M. T. BUILDING
13512 KINMAN RD
CLEVELAND, OHIO 44120
(JOINDER)

OPPRESSED PEOPLES NATION
C/O CHAIRMAN KEVON SMITH
14660 EUCLID AVENUE
EAST CLEVELAND, OHIO 44112
(JOINDER)

CLEVELAND BRANCH NAACP
C/O REV. HILTON O. SMITH, PRES.
7100 EUCLID AVENUE
CLEVELAND, OHIO 44103
(JOINDER)

CITY OF EAST CLEVELAND, OHIO
C/O MAYOR GARY NORTON JR
14340 EUCLID AVE
EAST CLEVELAND, OHIO 44112
(JOINDER)

EAST CLEVELAND MUNICIPAL COURT
C/O WENDY HOWARD
14340 EUCLID AVE
EAST CLEVELAND, OHIO 44112
(JOINDER)

CITY OF CLEVELAND OHIO AND
C/O MAYOR FRANK G. JACKSON
601 LAKESIDE AVE
CLEVELAND, OHIO 44114
(JOINDER)

CLEVELAND CLERK OF COURT
C/O EARLE B. TURNER
JUSTICE CENTER – LEVEL 2
1200 ONTARIO STREET
CLEVELAND, OHIO, 44113
(JOINDER)

COUNT 1

Now come Plaintiff pursuant to *Ohio Revised Code 2307.011 Civil action definitions, the U.S. Bill of Rights; Amendment I*, and *Jodka v. Cleveland*, 2014-Ohio-208. Plaintiff's complaint is for deactivation and/or removal of all of Defendants' Automated Camera Civil Traffic Enforcement Systems and devices that issue traffic citation or are related to the issuance thereof, from the Cities of Cleveland Ohio and East Cleveland Ohio for the following reason:

1. Defendants' automated camera civil traffic enforcement systems violates and disregard *Jodka v Cleveland 2014-Ohio-208* journalized on January 23rd, 2014. And therefore are violations of the law in that the continued use/practice of these systems do violate the Civil Rights of Plaintiff and all the people living in and traveling through these cities. Furthermore the use of Defendants unconstitutional enforcement system have and continue to hinder due process.
2. Defendants' automated camera civil traffic enforcement systems does not constitute a proper exercise of "concurrent police power" pursuant to R.C. 1901.20(A) (1). Nor is it otherwise a power of "local self-government." The use of these systems under-mind and eliminate "due process".
3. Defendants continued operation of Automated camera civil traffic enforcement systems on such large and ongoing scale turns into conspiracy, complicity, and corruption with many culpable agents involved (Ohio Revised Codes 2923.01, 2923.03, 2923.32), because they impose further hardship and frustration on these cities' already poverty stricken people.
4. Defendants automated camera civil traffic enforcement along with their allies, and investor are in violation of Ohio Revised Code 2921.51/ Impersonation of peace officer or private police officer.
5. Defendants violates the Ohio Constitution's Article IV, the operation of automated camera civil traffic enforcement systems and devices in Cleveland, and East Cleveland which thus violate the Civil Rights of Plaintiff and residents of these Cities'. Rights which all our elected officials, law enforcement, armed forces and public officials sworn an oath to protect.
6. Violating the constitution is wrong and it is against the law, and failure to correct it would make it a crime. It is corruption, removing or deactivating these systems and devices is correcting an error. Section, therefore On January 23rd, 2014
7. It interfere with, disrupt and dissolve "due process", a most sacred part of our constitution, our duty and our freedom.
8. These automated camera civil traffic enforcement systems and devices in Cleveland, and East Cleveland target and intimidate Plaintiff along with poor and minority people living in and traveling the streets of these cities.
9. Defendants' automated camera civil traffic enforcement systems and devices are saturated in predominately Black and Poor minorities in Cleveland, and East Cleveland, causing further oppression and loss of Police manpower.

10. Defendants' automated camera civil traffic enforcement systems and devices in Cleveland, and East Cleveland are not authorized law enforcement personnel and nor or the owners of these devices.
11. Defendants' automated camera civil traffic enforcement systems and devices in Cleveland, and East Cleveland are not an authorized part of either of these cities' tribunal.
12. Defendants and their automated camera civil traffic enforcement systems have also left these cities unprotected by adequate live authorized and constitutional police presence on duty to prevent and deter crime and to respond to calls of accidents and crime, because Defendants basically took over the jobs of qualified police officers and could not fulfil the requirements, aid fear and crime to run rampant
13. These cities were unable to apply for proper grant funding to allow for sustainability of adequate police force since Defendants system supposedly did their jobs more efficiently, which is useless if there are not adequate police officers to safely respond and/or investigate what Defendants camera systems see.

**CONSTITUTION OF THE UNITED STATES OF AMERICA
AMENDMENT XIV.**

Section 1.

All persons born or naturalized in the United States, and subject to the jurisdiction thereof, are citizens of the United States and of the State wherein they reside. No State shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any State deprive any person of life, liberty, or property, without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws.

U.S. Bill Of Rights. Amendment I

Congress shall make no law respecting an establishment of religion, or prohibiting the free exercise thereof; or abridging the freedom of speech, or of the press; or the right of the people peaceably to assemble, and to petition the Government for a redress of grievances.

JOINDERS

In accordance with Ohio Rule of Civil Procedure 19.(A), Joinders named in this case are necessary Joinders that should be Joinded Plaintiffs because they are needed for just adjudication in this complaint. The City of East Cleveland, Clerk of Court of East Cleveland, the City of Cleveland, and City of Cleveland Clerk of Court primarily because they are sworn to protect the interest and wellbeing of the people and to safeguard the Constitution to assure its sanctity and fairness, and who also because possibly unaware errors allowed Defendants to install and operate their Automatic Camera Civil Traffic Enforcement Systems that unconstitutionally interrupt due process and cause burdens upon the people they are trusted to care for. Therefore it is their responsibility to be joind Plaintiffs and/or assume this action to make this constitutional again. Moreover all named joinders are also necessary to be Joinded Plaintiffs in this case due to the nature of the duty of the Office and to the responsibility to their individual organizational mission statements. And if they do not answer to the call of duty as joinded Plaintiffs they are to become joinded as Defendants in this case in accordance with Ohio Rule of Civil Procedure 19.A.

RULE 19. Joinder of Persons Needed for Just Adjudication

(A) Persons to be joined if feasible. A person who is subject to service of process shall be joined as a party in the action if (1) in his absence complete relief cannot be accorded among those already parties, or (2) he claims an interest relating to the subject of the action and is so situated that the disposition of the action in his absence may (a) as a practical matter impair or impede his ability to protect that interest or (b) leave any of the persons already parties subject to a substantial risk of incurring double, multiple, or otherwise inconsistent obligations by reason of his claimed interest, or (3) he has an interest relating to the subject of the action as an assignor, assignee, subrogor, or subrogee. If he has not been so joined, the court shall order that he be made a party upon timely assertion of the defense of failure to join a party as provided in Rule 12(B)(7). If the defense is not timely asserted, waiver is applicable as provided in Rule 12(G) and (H). If he should join as a plaintiff but refuses to do so, he may be made a defendant, or, in a proper case, an involuntary plaintiff. In the event that such joinder causes the relief sought to exceed the jurisdiction of the court, the court shall certify the proceedings in the action to the court of common pleas.

COUNT 2

Count two of Plaintiff's complaint is for Defendants to pay restitution to poor and minority residents of the Cities of East Cleveland and Cleveland to help repair justice and fairness and economic soundness among "We The People" for whom it have been broken by the Defendants for un-due personal financial gain at the hardship of the poor,

As Defendants unconstitutional acts with their unconstitutional Automated Camera Civil Traffic Enforcement Systems have produced unclean fruit for which they should not be allow to maintain gain of. Instead such

profit gained should be used to help restore the desolation in these cities and in the lives of their residents which Defendants took ill advantage of helping cause more difficulties abroad.

Defendants either knew of the state of poverty in these two cities and did not care, or did not research to find out first, because they didn't care. Defendants strategically situated their automated camera civil traffic enforcement system cameras as to prey on poverty stricken communities and financially desperate and misinformed City and elected officials. Promising them a dream that would only fleece the poor to line Defendants own pockets.

Plaintiff respectfully ask this Court to cause Defendants to restore to the residents and cities here from which taken in their unconstitutional and misrepresent sales tactics.



TUA Help Save East Cleveland Project
10801 Union Avenue
Cleveland, Ohio 44105
Ph: 216-543-1817
(Plaintiff/ProSe)

Certificate of Service

This is to certify, that a true and exact copy of the foregoing has been duly served upon the following by ordinary U. S. Mail, postage prepaid, this 21st day of March, 2014.

BLACK ON BLACK CRIME INC
C/O FOUNDER, ART MCKOY
14660 EUCLID AVENUE
EAST CLEVELAND, OHIO 44112
(JOINDER)

PEACE IN THE HOOD, AND
THE COALITION FOR A BETTER LIFE
C/O CEO, KHALID SAMAD
YORK M. T. BUILDING
13512 KINMAN RD
CLEVELAND, OHIO 44120
(JOINDER)

OPPRESSED PEOPLES NATION
C/O CHAIRMAN KEVON SMITH
14660 EUCLID AVENUE
EAST CLEVELAND, OHIO 44112
(JOINDER)

CLEVELAND BRANCH NAACP
C/O REV. HILTON O. SMITH, PRES.
7100 EUCLID AVENUE
CLEVELAND, OHIO 44103
(JOINDER)

CITY OF EAST CLEVELAND, OHIO
C/O MAYOR GARY NORTON JR
14340 EUCLID AVE
EAST CLEVELAND, OHIO 44112
(JOINDER)

EAST CLEVELAND CLERK OF COURT
C/O WENDY HOWARD
14340 EUCLID AVE
EAST CLEVELAND, OHIO 44112
(JOINDER)

CITY OF CLEVELAND OHIO AND
C/O MAYOR FRANK G. JACKSON
601 LAKESIDE AVE
CLEVELAND, OHIO 44114
(JOINDER)

CLEVELAND CLERK OF COURT
C/O EARLE B. TURNER
JUSTICE CENTER – LEVEL 2
1200 ONTARIO STREET
CLEVELAND, OHIO, 44113
(JOINDER)

XEROX CORPORATION
C/O CEO, URSULA M. BURNS
AND DIR. KEVIN LAFEVER
45 GLOVER AVENUE
NORWALK, CT 06856-4505
(DEFENDANT)

AMERICAN TRAFFIC SOLUTIONS
aka: ATS, AND CEO JAMES D. TUTON
AND, EXE V P ADAM E. TUTON
1330 W. SOUTHERN AVENUE
TEMPLE, AZ. 85282
(DEFENDANT)

A handwritten signature in black ink, appearing to be 'R. A.', with a long horizontal stroke extending to the right.

TUA Help Save East Cleveland Project
10801 Union Avenue
Cleveland, Ohio 44105
Ph: 216-543-1817
Plaintiff/ProSe

SUMMONS IN A CIVIL ACTION COURT OF COMMON PLEAS, CUYAHOGA COUNTY JUSTICE CENTER
CLEVELAND, OHIO 44113

CASE NO.
CV14824122

D1 CM

SUMMONS NO.
23101794

Rule 4 (B) Ohio

Rules of Civil
Procedure

TUA HELP SAVE EAST CLEVELAND PROJECT
VS
XEROX CORPORATION, ET AL

PLAINTIFF

DEFENDANT

SUMMONS

XEROX CORPORATION
C/O CEO URSULA M. BURNS AND DIR
KEVIN LAFEVER
45 GLOVER AVENUE
NORWALK CT 06856-0000

You have been named defendant in a complaint (copy attached hereto) filed in Cuyahoga County Court of Common Pleas, Cuyahoga County Justice Center, Cleveland, Ohio 44113, by the plaintiff named herein.

You are hereby summoned and required to answer the complaint within 28 days after service of this summons upon you, exclusive of the day of service.

Said answer is required to be served on Plaintiff's Attorney (Address denoted by arrow at left.)

Your answer must also be filed with the court within 3 days after service of said answer on plaintiff's attorney.

If you fail to do so, judgment by default will be rendered against you for the relief demanded in the complaint.

Said answer is required to be served on:



Plaintiff's Attorney (Pro Se)

TUA HELP SAVE EAST CLEVELAND P
10801 UNION AVENUE
CLEVELAND, OH 44105-0000

Case has been assigned to Judge:

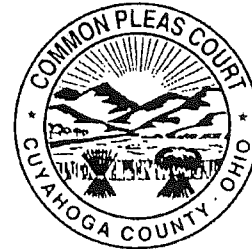
CASSANDRA COLLIER-WILLIAMS
Do not contact judge. Judge's name is given for attorney's reference only.

DATE
Mar 25, 2014

ANDREA F. ROCCO
Clerk of the Court of Common Pleas

By

Deputy



COMPLAINT FILED 03/24/2014



SUMMONS IN A CIVIL ACTION COURT OF COMMON PLEAS, CUYAHOGA COUNTY JUSTICE CENTER
CLEVELAND, OHIO 44113

CASE NO.
CV14824122

D2 CM

SUMMONS NO.
23101795

Rule 4 (B) Ohio

Rules of Civil
Procedure

TUA HELP SAVE EAST CLEVELAND PROJECT
VS
XEROX CORPORATION, ET AL

PLAINTIFF
DEFENDANT

SUMMONS

AMERICAN TRAFFIC SOLUTIONS
AKA ATS, AND CEO JAMES D. TUTON
AND, EXE V P ADAM E. TUTON
1330 W SOUTHERN AVENUE
TEMPE AZ 85282-0000

You have been named defendant in a complaint
(copy attached hereto) filed in Cuyahoga County
Court of Common Pleas, Cuyahoga County Justice
Center, Cleveland, Ohio 44113, by the plaintiff
named herein.

Said answer is required to be served on:



Plaintiff's Attorney (Pro Se)

TUA HELP SAVE EAST CLEVELAND P
10801 UNION AVENUE
CLEVELAND, OH 44105-0000

You are hereby summoned and required to
answer the complaint within 28 days after service
of this summons upon you, exclusive of the day of
service.

Said answer is required to be served on Plaintiff's
Attorney (Address denoted by arrow at left.)

Your answer must also be filed with the court
within 3 days after service of said answer on
plaintiff's attorney.

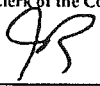
If you fail to do so, judgment by default will be
rendered against you for the relief demanded in the
complaint.

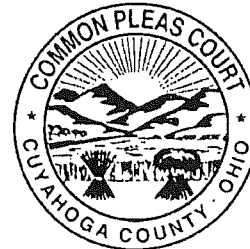
Case has been assigned to Judge:

CASSANDRA COLLIER-WILLIAMS
Do not contact judge. Judge's name is given for
attorney's reference only.

DATE
Mar 25, 2014

ANDREA F. ROCCO
Clerk of the Court of Common Pleas

By  Deputy



COMPLAINT FILED 03/24/2014





COLLIER-WILLIAMS CV14824122D2
365-1350

1. Article Addressed to:

AMERICAN TRAFFIC SOLUTIONS
AKA ATS, AND CEO JAMES D.
TUTON AND, EXE V P ADAM E.
TUTON
1330 W SOUTHERN AVENUE
TEMPE AZ 85282-0000

COMPLETE THIS SECTION ON DELIVERY

A. Signature
[Signature]
☐ Agent
☐ Addressee

B. Received by (Printed Name)
Christina Burt
C. Date of Delivery
3/3/14

D. Is delivery address different from item 1?
If YES, enter delivery address below:
☐ Yes
☐ No

3. Service Type
☒ Certified Mail

4. Restricted Delivery? (Extra Fee) ☐ Yes

2. Article Number
(Transfer from service label)
23101795

UNITED STATES POSTAL SERVICE

PHOENIX
AZ 852

31 MAR '14

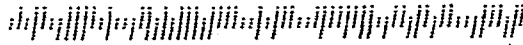
PM 4 L

First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

- Sender: Please print your name, address, ZIP+4 in this box •

ANDREA F. ROCCO
CLERK OF COURTS
1200 ONTARIO STREET
CLEVELAND, OH 44113-1664

8165499



SUMMONS IN A CIVIL ACTION COURT OF COMMON PLEAS, CUYAHOGA COUNTY JUSTICE CENTER
CLEVELAND, OHIO 44113

CASE NO.
CV14824122

D9 CM

SUMMONS NO.
23101802

Rule 4 (B) Ohio

Rules of Civil
Procedure

SUMMONS

TUA HELP SAVE EAST CLEVELAND PROJECT
VS
XEROX CORPORATION, ET AL

PLAINTIFF
DEFENDANT

CITY OF CLEVELAND OHIO
AND C/O MAYOR FRANK G. JACKSON
601 LAKESIDE AVE
CLEVELAND OH 44114-0000

You have been named defendant in a complaint (copy attached hereto) filed in Cuyahoga County Court of Common Pleas, Cuyahoga County Justice Center, Cleveland, Ohio 44113, by the plaintiff named herein.

You are hereby summoned and required to answer the complaint within 28 days after service of this summons upon you, exclusive of the day of service.

Said answer is required to be served on Plaintiff's Attorney (Address denoted by arrow at left.)

Your answer must also be filed with the court within 3 days after service of said answer on plaintiff's attorney.

If you fail to do so, judgment by default will be rendered against you for the relief demanded in the complaint.

Said answer is required to be served on:



Plaintiff's Attorney (Pro Se)

TUA HELP SAVE EAST CLEVELAND P
10801 UNION AVENUE
CLEVELAND, OH 44105-0000

Case has been assigned to Judge:

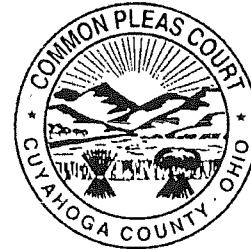
CASSANDRA COLLIER-WILLIAMS
Do not contact judge. Judge's name is given for attorney's reference only.

DATE
Mar 25, 2014

ANDREA F. ROCCO
Clerk of the Court of Common Pleas

By

Deputy



COMPLAINT FILED 03/24/2014





COLLIER-WILLIAMS CV148241220
365-1350

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

3/28/14

Agent

☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes

If YES, enter delivery address below:

☐ No

FOR CERTIFIED MAIL
CITY OF CLEVELAND
DIVISION OF PRINTING
AND REPRODUCTION

3. Service Type

☒ Certified Mail

4. Restricted Delivery? (Extra Fee)

☐ Yes

1. Article Addressed to:

CITY OF CLEVELAND OHIO
AND C/O MAYOR FRANK G.
JACKSON
601 LAKESIDE AVE
CLEVELAND OH 44114-0000

2. Article Number

(Transfer from service label)

23101802

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

UNITED STATES POSTAL SERVICE



First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

• Sender: Please print your name, address, ZIP+4 in this box •

ANDREA F. ROCCO
CLERK OF COURTS
1200 ONTARIO STREET
CLEVELAND, OH 44113-1664

SUMMONS IN A CIVIL ACTION COURT OF COMMON PLEAS, CUYAHOGA COUNTY JUSTICE CENTER
CLEVELAND, OHIO 44113CASE NO.
CV14824122D10
HANDSUMMONS NO.
23101806

Rule 4 (B) Ohio

Rules of Civil
ProcedureTUA HELP SAVE EAST CLEVELAND PROJECT
VS
XEROX CORPORATION, ET ALPLAINTIFF
DEFENDANT

SUMMONS

CLEVELAND CLERK OF COURT
C/O EARLE B. TURNER
JUSTICE CENTER - LEVEL 2
1200 ONTARIO STREET
CLEVELAND OH 44113-0000

You have been named defendant in a complaint (copy attached hereto) filed in Cuyahoga County Court of Common Pleas, Cuyahoga County Justice Center, Cleveland, Ohio 44113, by the plaintiff named herein.

You are hereby summoned and required to answer the complaint within 28 days after service of this summons upon you, exclusive of the day of service.

Said answer is required to be served on Plaintiff's Attorney (Address denoted by arrow at left.)

Your answer must also be filed with the court within 3 days after service of said answer on plaintiff's attorney.

If you fail to do so, judgment by default will be rendered against you for the relief demanded in the complaint.

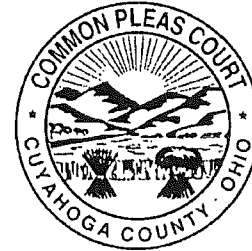
Said answer is required to be served on:



Plaintiff's Attorney (Pro Se)

TUA HELP SAVE EAST CLEVELAND P
10801 UNION AVENUE
CLEVELAND, OH 44105-0000

Case has been assigned to Judge:

CASSANDRA COLLIER-WILLIAMS
Do not contact judge. Judge's name is given for attorney's reference only.ANDREA F. ROCCO
Clerk of the Court of Common PleasDATE
Mar 25, 2014By  Deputy

COMPLAINT FILED 03/24/2014



The above named party hereby waives service of summons and complaint by certified mail per waiver located in the clerk's minute book at MB 13 000001. In lieu of service by certified mail, I received a copy of the summons and complaint in the above captioned case at the address noted in the complaint, or per instructions, on _____, 20____.

Print Name_____
Signature

SUMMONS IN A CIVIL ACTION . COURT OF COMMON PLEAS, CUYAHOGA COUNTY JUSTICE CENTER
CLEVELAND, OHIO 44113CASE NO.
CV14824122D10
HANDSUMMONS NO.
23101806

Rule 4 (B) Ohio

FILED

Rules of Civil
ProcedureTUA HELP SAVE EAST CLEVELAND PROJECT
VS
XEROX CORPORATION, ET AL

2014 MAR 27 A 10:20

SUMMONS

DEFENDANT
WINDOW 5
CLERK OF COURTS
CUYAHOGA COUNTYCLEVELAND CLERK OF COURT
C/O EARLE B. TURNER
JUSTICE CENTER - LEVEL 2
1200 ONTARIO STREET
CLEVELAND OH 44113-0000You have been named defendant in a complaint
(copy attached hereto) filed in Cuyahoga County
Court of Common Pleas, Cuyahoga County Justice
Center, Cleveland, Ohio 44113, by the plaintiff
named herein.You are hereby summoned and required to
answer the complaint within 28 days after service
of this summons upon you, exclusive of the day of
service.

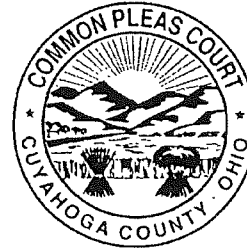
Said answer is required to be served on:

Said answer is required to be served on Plaintiff's
Attorney (Address denoted by arrow at left.)

Plantiff's Attorney (Pro Se)

TUA HELP SAVE EAST CLEVELAND . P
10801 UNION AVENUE
CLEVELAND, OH 44105-0000Your answer must also be filed with the court
within 3 days after service of said answer on
plaintiff's attorney.If you fail to do so, judgment by default will be
rendered against you for the relief demanded in the
complaint.

Case has been assigned to Judge:

CASSANDRA COLLIER-WILLIAMS
Do not contact judge. Judge's name is given for
attorney's reference only.ANDREA F. ROCCO
Clerk of the Court of Common PleasDATE
Mar 25, 2014

By

A. Benard

Deputy

COMPLAINT FILED 03/24/2014

The above named party hereby waives service of summons and complaint by certified mail per waiver located in the clerk's minute
book at MB 13 000001. In lieu of service by certified mail, I received a copy of the summons and complaint in the above captioned
case at the address noted in the complaint, or per instructions, on _____, 20____.

Print Name

Signature

L. m fox

Lmfx

SUMMONS IN A CIVIL ACTION COURT OF COMMON PLEAS, CUYAHOGA COUNTY JUSTICE CENTER
CLEVELAND, OHIO 44113

CASE NO.
CV14824122

D7 CM

SUMMONS NO.
23101800

Rule 4 (B) Ohio

Rules of Civil
Procedure

TUA HELP SAVE EAST CLEVELAND PROJECT
VS
XEROX CORPORATION, ET AL

PLAINTIFF

DEFENDANT

SUMMONS

CITY OF EAST CLEVELAND OHIO
C/O MAYOR GARY NORTON JR
14340 EUCLID AVE
E CLEVELAND OH 44112-0000

You have been named defendant in a complaint (copy attached hereto) filed in Cuyahoga County Court of Common Pleas, Cuyahoga County Justice Center, Cleveland, Ohio 44113, by the plaintiff named herein.

You are hereby summoned and required to answer the complaint within 28 days after service of this summons upon you, exclusive of the day of service.

Said answer is required to be served on:



Plaintiff's Attorney (Pro Se)

Said answer is required to be served on Plaintiff's Attorney (Address denoted by arrow at left.)

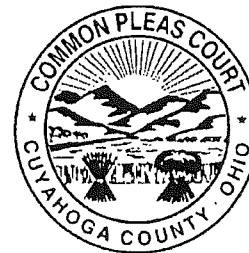
TUA HELP SAVE EAST CLEVELAND P
10801 UNION AVENUE
CLEVELAND, OH 44105-0000

Your answer must also be filed with the court within 3 days after service of said answer on plaintiff's attorney.

If you fail to do so, judgment by default will be rendered against you for the relief demanded in the complaint.

Case has been assigned to Judge:

CASSANDRA COLLIER-WILLIAMS
Do not contact judge. Judge's name is given for attorney's reference only.



ANDREA F. ROCCO
Clerk of the Court of Common Pleas

DATE
Mar 25, 2014

By

Deputy

COMPLAINT FILED 03/24/2014



MAR 28 2014

COLLIER-WILLIAMS CV14824122D7
365-1350

COMPLETE THIS SECTION ON DELIVERY

A. Signature

[Signature]☐ Agent☐ Addressee

B. Received by (Printed Name)

Nathaniel R. Gory

C. Date of Delivery

3/27/14

D. Is delivery address different from item 1?

☐ Yes

If YES, enter delivery address below:

☐ No

1. Article Addressed to:

CITY OF EAST CLEVELAND OHIO
C/O MAYOR GARY NORTON JR
14340 EUCLID AVE
E CLEVELAND OH 44112-0000

3. Service Type

☒ Certified Mail

4. Restricted Delivery? (Extra Fee)

☐ Yes

2. Article Number

(Transfer from service label)

23101800

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

UNITED STATES POSTAL SERVICE



First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

• Sender: Please print your name, address, ZIP+4 in this box •

ANDREA F. ROCCO
CLERK OF COURTS
1200 ONTARIO STREET
CLEVELAND, OH 44113-1664

SUMMONS IN A CIVIL ACTION COURT OF COMMON PLEAS, CUYAHOGA COUNTY JUSTICE CENTER
CLEVELAND, OHIO 44113

CASE NO.
CV14824122

DB CM

SUMMONS NO.
23101801

Rule 4 (B) Ohio

Rules of Civil
Procedure

TUA HELP SAVE EAST CLEVELAND PROJECT
VS
XEROX CORPORATION, ET AL

PLAINTIFF
DEFENDANT

SUMMONS

EAST CLEVELAND MUNICIPAL COURT
C/O WENDY HOWARD
14340 EUCLID AVE
E CLEVELAND OH 44112-0000

You have been named defendant in a complaint (copy attached hereto) filed in Cuyahoga County Court of Common Pleas, Cuyahoga County Justice Center, Cleveland, Ohio 44113, by the plaintiff named herein.

You are hereby summoned and required to answer the complaint within 28 days after service of this summons upon you, exclusive of the day of service.

Said answer is required to be served on:



Plaintiff's Attorney (Pro Se)

TUA HELP SAVE EAST CLEVELAND P
10801 UNION AVENUE
CLEVELAND, OH 44105-0000

Said answer is required to be served on Plaintiff's Attorney (Address denoted by arrow at left.)

Your answer must also be filed with the court within 3 days after service of said answer on plaintiff's attorney.

If you fail to do so, judgment by default will be rendered against you for the relief demanded in the complaint.

Case has been assigned to Judge:

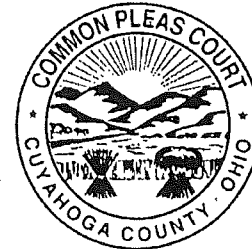
CASSANDRA COLLIER-WILLIAMS
Do not contact judge. Judge's name is given for attorney's reference only.

DATE
Mar 25, 2014

ANDREA F. ROCCO
Clerk of the Court of Common Pleas

By

Deputy



COMPLAINT FILED 03/24/2014



MAR 18 2014

COLLIER-WILLIAMS CV14824122DS
365-1350

COMPLETE THIS SECTION ON DELIVERY

A. Signature

 ☒ Agent
☐ Addressee

B. Received by (Printed Name)

Notary Public 3/27/14

C. Date of Delivery

D. Is delivery address different from item 1?

☐ Yes

If YES, enter delivery address below:

☐ No

1. Article Addressed to:

EAST CLEVELAND MUNICIPAL
COURT
C/O WENDY HOWARD
14340 EUCLID AVE.
E CLEVELAND OH 44112-0000

3. Service Type

☒ Certified Mail

4. Restricted Delivery? (Extra Fee)

☐ YesArticle Number
(Transfer from service label)

23101801

S Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

UNITED STATES POSTAL SERVICE



First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

• Sender: Please print your name, address, ZIP+4 in this box •

ANDREA F. ROCCO
CLERK OF COURTS
1200 ONTARIO STREET
CLEVELAND, OH 44113-1664

SUMMONS IN A CIVIL ACTION COURT OF COMMON PLEAS, CUYAHOGA COUNTY JUSTICE CENTER
CLEVELAND, OHIO 44113

CASE NO.
CV14824122

D3 CM

SUMMONS NO.
23101796

Rule 4 (B) Ohio

Rules of Civil
Procedure

TUA HELP SAVE EAST CLEVELAND PROJECT
VS

PLAINTIFF

XEROX CORPORATION, ET AL

DEFENDANT

SUMMONS

BLACK ON BLACK CRIME INC
C/O FOUNDER, ART MCKOY
14660 EUCLID AVENUE
EAST CLEVELAND OH 44112-0000

You have been named defendant in a complaint (copy attached hereto) filed in Cuyahoga County Court of Common Pleas, Cuyahoga County Justice Center, Cleveland, Ohio 44113, by the plaintiff named herein.

You are hereby summoned and required to answer the complaint within 28 days after service of this summons upon you, exclusive of the day of service.

Said answer is required to be served on:



Plaintiff's Attorney (Pro Se)

TUA HELP SAVE EAST CLEVELAND P
10801 UNION AVENUE
CLEVELAND, OH 44105-0000

Said answer is required to be served on Plaintiff's Attorney (Address denoted by arrow at left.)

Your answer must also be filed with the court within 3 days after service of said answer on plaintiff's attorney.

If you fail to do so, judgment by default will be rendered against you for the relief demanded in the complaint.

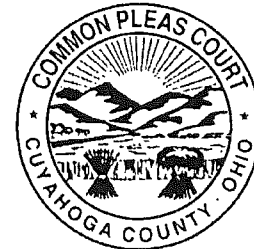
Case has been assigned to Judge:

CASSANDRA COLLIER-WILLIAMS
Do not contact judge. Judge's name is given for attorney's reference only.

DATE
Mar 25, 2014

ANDREA F. ROCCO
Clerk of the Court of Common Pleas

By _____
Deputy



COMPLAINT FILED 03/24/2014



SUMMONS IN A CIVIL ACTION COURT OF COMMON PLEAS, CUYAHOGA COUNTY JUSTICE CENTER
CLEVELAND, OHIO 44113

CASE NO.
CV14824122

D4 CM

SUMMONS NO.
23101797

Rule 4 (B) Ohio

Rules of Civil
Procedure

TUA HELP SAVE EAST CLEVELAND PROJECT
VS
XEROX CORPORATION, ET AL

PLAINTIFF
DEFENDANT

SUMMONS

PEACE IN THE HOOD AND THE COALITION
FOR A BETTER LIFE
C/O CEO KHALID SAMAD
YORK M. T. BUILDING
13512 KINMAN RD
CLEVELAND OH 44120-0000

You have been named defendant in a complaint
(copy attached hereto) filed in Cuyahoga County
Court of Common Pleas, Cuyahoga County Justice
Center, Cleveland, Ohio 44113, by the plaintiff
named herein.

Said answer is required to be served on:



Plaintiff's Attorney (Pro Se)

TUA HELP SAVE EAST CLEVELAND P
10801 UNION AVENUE
CLEVELAND, OH 44105-0000

You are hereby summoned and required to
answer the complaint within 28 days after service
of this summons upon you, exclusive of the day of
service.

Said answer is required to be served on Plaintiff's
Attorney (Address denoted by arrow at left.)

Your answer must also be filed with the court
within 3 days after service of said answer on
plaintiff's attorney.

If you fail to do so, judgment by default will be
rendered against you for the relief demanded in the
complaint.

Case has been assigned to Judge:

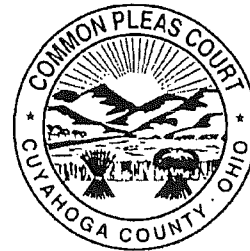
CASSANDRA COLLIER-WILLIAMS
Do not contact judge. Judge's name is given for
attorney's reference only.

DATE
Mar 25, 2014

By

Deputy

ANDREA F. ROCCO
Clerk of the Court of Common Pleas



COMPLAINT FILED 03/24/2014



SUMMONS IN A CIVIL ACTION COURT OF COMMON PLEAS, CUYAHOGA COUNTY JUSTICE CENTER
CLEVELAND, OHIO 44113

CASE NO.
CV14824122

D5 CM

SUMMONS NO.
23101798

Rule 4 (B) Ohio

Rules of Civil
Procedure

TUA HELP SAVE EAST CLEVELAND PROJECT
VS
XEROX CORPORATION, ET AL

PLAINTIFF
DEFENDANT

SUMMONS

OPPRESSED PEOPLES NATION
C/O CHAIRMAN KEVON SMITH
14660 EUCLID AVENUE
EAST CLEVELAND OH 44112-0000

You have been named defendant in a complaint (copy attached hereto) filed in Cuyahoga County Court of Common Pleas, Cuyahoga County Justice Center, Cleveland, Ohio 44113, by the plaintiff named herein.

You are hereby summoned and required to answer the complaint within 28 days after service of this summons upon you, exclusive of the day of service.

Said answer is required to be served on:



Plaintiff's Attorney (Pro Se)

TUA HELP SAVE EAST CLEVELAND P
10801 UNION AVENUE
CLEVELAND, OH 44105-0000

Said answer is required to be served on Plaintiff's Attorney (Address denoted by arrow at left.)

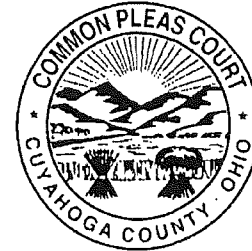
Your answer must also be filed with the court within 3 days after service of said answer on plaintiff's attorney.

If you fail to do so, judgment by default will be rendered against you for the relief demanded in the complaint.

Case has been assigned to Judge:

CASSANDRA COLLIER-WILLIAMS
Do not contact judge. Judge's name is given for attorney's reference only.

ANDREA F. ROCCO
Clerk of the Court of Common Pleas



DATE
Mar 25, 2014

By

Deputy

COMPLAINT FILED 03/24/2014



SUMMONS IN A CIVIL ACTION COURT OF COMMON PLEAS, CUYAHOGA COUNTY JUSTICE CENTER
CLEVELAND, OHIO 44113

CASE NO.
CV14824122

D6 CM

SUMMONS NO.
23101799

Rule 4 (B) Ohio

Rules of Civil
Procedure

TUA HELP SAVE EAST CLEVELAND PROJECT
VS

PLAINTIFF

XEROX CORPORATION, ET AL

DEFENDANT

SUMMONS

CLEVELAND BRANCH NAACP
C/O REV HILTON O. SMITH PRES
7100 EUCLID AVENUE
CLEVELAND OH 44103-0000

You have been named defendant in a complaint (copy attached hereto) filed in Cuyahoga County Court of Common Pleas, Cuyahoga County Justice Center, Cleveland, Ohio 44113, by the plaintiff named herein.

You are hereby summoned and required to answer the complaint within 28 days after service of this summons upon you, exclusive of the day of service.

Said answer is required to be served on:



Plaintiff's Attorney (Pro Se)

TUA HELP SAVE EAST CLEVELAND P
10801 UNION AVENUE
CLEVELAND, OH 44105-0000

Said answer is required to be served on Plaintiff's Attorney (Address denoted by arrow at left.)

Your answer must also be filed with the court within 3 days after service of said answer on plaintiff's attorney.

If you fail to do so, judgment by default will be rendered against you for the relief demanded in the complaint.

Case has been assigned to Judge:

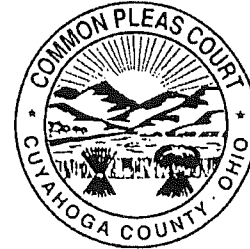
CASSANDRA COLLIER-WILLIAMS
Do not contact judge. Judge's name is given for attorney's reference only.

DATE
Mar 25, 2014

ANDREA F. ROCCO
Clerk of the Court of Common Pleas

By

Deputy



COMPLAINT FILED 03/24/2014



MAR 31 2014

ER-WILLIAMS CV14824122D6
1350

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X  ☐ Agent
☐ AddresseeB. Received by (Printed Name) C. Date of Delivery
3-28-14D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No3. Service Type
☒ Certified Mail4. Restricted Delivery? (Extra Fee) ☐ Yes

1. Article Addressed to:

CLEVELAND BRANCH NAACP
C/O REV HILTON O. SMITH
PRES
7100 EUCLID AVENUE
CLEVELAND OH 44103-0000

(EDP)

2. Article Number

(Transfer from service label)

23101799

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

UNITED STATES POSTAL SERVICE



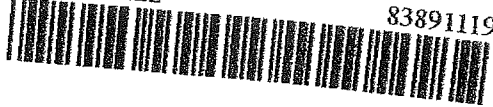
U.S.
Permit

- Sender: Please print your name, address, ZIP+4 in this box

ANDREA F. ROCCO
CLERK OF COURTS
1200 ONTARIO STREET
CLEVELAND, OH 44113-1664

CV14824122

83891119



FILED

2014 APR 16 A 9:03

**COURT OF COMMON PLEAS
CUYAHOGA COUNTY, OHIO**

WIDOW, A
CLERK OF COURTS
CUYAHOGA COUNTY

**JUDGE: CASSANDRA
COLLIER-WILLIAMS**

**TUA HELP SAVE EAST CLEVELAND PROJECT
(PLAINTIFF)**

CASE NO: CV 14 824122

**SAM JODKA,
AND, UNKNOWNNS
3922 RENNES DRIVES
COLUMBUS, OHIO 43221
(JOIND PLAINTIFF)**

VS

**XEROX CORPORATION
(DEFENDANT)**

**PLAINTIFF, TUA HELP SAVE EAST
EAST CLEVELAND PROJECT'S
NOTICE OF AMENDMENT TO THIS
COMPLAINT IN ACCORDANCE WITH
OHIO RULES OF CIVIL PROCEDURE
15. A. AND D, RULE 19.A, AND 19.1.A**

**BARBARA A. LANGHENRY, AND,
JOHN P. L. MILLS, AND, RICHARD
F. HORVATH, AND, JOSEPH F. SCOTT,
AND, HAROLD A. MADORSKY, AND,
MICHELE R. COMER, AND, RONDA G.
CURTIS, AND, RICHARD, BERTOVICH,
AND, WILLIAM MENZALORA, AND,
KIM ROBERSON, AND, VICTOR R. PEREZ,
AND, KIMBERLY G. BARNETT, AND,
CYNTHIA LIS, AND THOMAS KAISER,
AND RHONDA R. SMITH, AND, ALL
ASSOCIATED UNKNOWN PERSONS OF
THE LAW DEPT OF CITY OF CLEVELAND
601 LAKESIDE AVE., ROOM 106
CLEVELAND, OHIO 44114
(DEFENDANTS)**

PROCESSED

APR 17 2014

**CUYAHOGA COUNTY CLERK
OF COURTS
IMAGING DEPARTMENT**

C

Plaintiff TUA Help Save East Cleveland Project hereby give notice of amendment to the complaints in the case to include the following parties, along with the reason why they are included:

1. Sam Jodka, is named a joined "Plaintiff" because this party is necessary to reach adjudication in this case and because this person has an interest in, and/or a claim arising out of the personal injury or property damage to the person caused to him by the same wrongful act redressed in this case (see exhibit A attached).
2. Barbara A. Langhenry, John P.L. Mills, Richard F. Orvath, Joseph F. Scott, Harold A. Madorsky, Michele R. Comer, Ronda G. Curtis, Richard Bertovich, William Menzalora, Kim Roberson, Victor R. Perez, Kimberly G. Bennett, Cynthia Lis, Thomas Kaiser, Rhonda R. Smith and all associated unknown persons of The Law Dept. Of City Of Cleveland are individuals (see exhibit B attached) joined as Defendants because we believe it was and is each and every one of their duty individually and collectively to, research, advise and direct the City of Cleveland's Mayor and other elected official in lawful and constitutional transactions and standard operating procedure that would at all times safeguard, protect, uphold, adhere to, and "be" examples of the Constitution of The United States Of America along with all federal, State, Journalized Ruled Opinions, local laws and ordinance in behalf of the people, the citizens and residents of Cleveland and all who enter the City's borders (*Cleveland Ohio Code of Ordinance 15. 83 – 86*)(see exhibit C attached).

We believe that had these Defendant done their moral, and civil duty and done their jobs to protect the Citizens & Residents and the City from unconstitutional traffic enforcement cameras, and if they had individually or collectively protected "due process", or assured that the City did not violate it's our codes and charter; that there would be no need for this case. We believe that these Defendants either made a mistake among them all, or that they conspired to ignore the City's codes and charter and further conspired with Defendant Xerox to burden, intimidate, and make illegal profits through corrupt acts against Plaintiffs and the people. Especially because these Defendants both individually and collectively personally continue to elude opportunities to make immediate correction of such unconstitutionality of this whole matter. Instead these Defendants tend to defend Defendants Xerox, and American Traffic Systems in this case under the illusion defending the City of Cleveland while the City itself is in no terminology Defendant in this case, and neither will it be named so by Plaintiff unless it insist on being a Defendant itself, but refusal to be joind Plaintiff. The reason is we believe that the City of Cleveland is as much a victim of Defendant Xerox's Cam Scams as are the Plaintiff and the people.

City of Cleveland Ohio Codified Ordinances

§ 83 Director of Law; Qualifications and Duties

The Director of Law shall be an attorney at law admitted to practice in the State of Ohio. He shall be the legal advisor of and attorney and counsel for the City, and for all officers and

departments thereof in matters relating to their official duties. He shall prosecute or defend all suits for and in behalf of the City, and shall prepare all contracts, bonds and other instruments in writing in which the City is concerned and shall endorse on each his approval of the form and correctness thereof. No such bond, contract or instrument shall become effective without such endorsement by the Director of Law thereon.
(Effective November 9, 1931)

§ 84 Director as Prosecuting Attorney

The Director of Law shall be the Prosecuting Attorney of the Municipal Court. He may designate such number of assistant prosecutors as the Council by ordinance may authorize. He shall prosecute all cases brought before such Court and perform the same duties, so far as they are applicable thereto, as are required of the Prosecuting Attorney of the County.
(Effective November 9, 1931)

§ 85 Suits Affecting City

When required to do so by resolution of the Council, the Director of Law shall prosecute or defend for and in behalf of the City, all complaints, suits and controversies in which the City is a party, and such other suits, matters and controversies as he shall, by resolution or ordinance, be directed to prosecute or defend.
(Effective November 9, 1931)

§ 86 Legal Opinions

The Council, the director of any department, or any officer or commission not included within a department, may require the opinion of the Director of Law upon any question of law involving their respective powers or duties.
(Effective November 9, 1931)



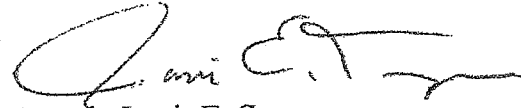
TUA Help Save East Cleveland Project
10801 Union Avenue
Cleveland, Ohio 44105
Ph: 216-543-1817
(Plaintiff/ProSe)



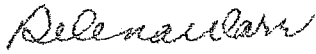
Pastor Cheryl Thompson
Vice Adminr



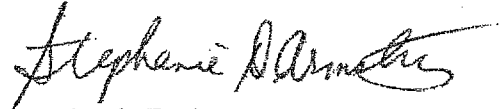
Beverly Moore
2nd Vice Adminr



Apostle Jarvis E. Cooper
3rd Vice Adminr



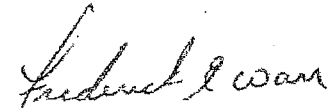
Delena M. Warr
Member



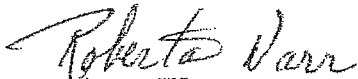
Stephanie D. Armstrong
Member



Derry Frazier
Member



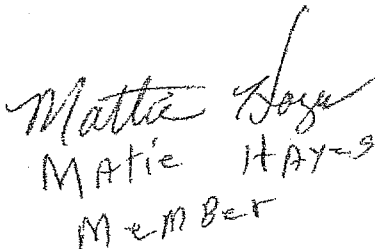
Frederick E. Warr
Member



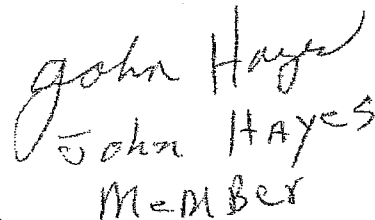
Roberta Warr
Member

UNAVAILABLE

Zay Dotson
Member



MATIE HAYES
MEMBER



John HAYES
MEMBER

Cuyahoga County Clerk of Courts - Case Summary

Page 1 of 1

Print

CASE INFORMATION

CA-13-099951 SAM JODKA vs. CITY OF CLEVELAND ET AL

Summary

Case Number: CA-13-099951
Case Title: SAM JODKA vs. CITY OF CLEVELAND ET AL
Trial Case Number: CV-12-78437Z
Trial Court: COMMON PLEAS COURT
Case Code: OTHER
Notice of Appeal Date: 05/30/2013
File Location: PEND.FILE
Case Status: APPEALED TO OHIO SUPREME COURT
Case Status Date: 04/07/2014

Only the official court records available from the Cuyahoga County Clerk of Courts, available in person, should be relied upon as accurate and current.

For questions/comments please [click here](#).

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Contact List

FOR INFORMATION REGARDING:	CONTACT PERSON(S)	PHONE	FAX
Administration	Barbara A. Langhenry Director of Law	216.664.2800	216.664.2663
Criminal Division	Victor R. Perez Chief Assistant Prosecutor	216.664.4850	216.664.4309
Criminal Division	Kimberly G. Barnett First Assistant Prosecutor	216.664.4850	216.664.4399
Claims Division	Cynthia Lis Claims Examiner Send Email	216.664.2859	216.664.2663
Claims Division	Rhonda R. Smith Claims Examiner Send Email	216.664.2803	216.664.2663
Civil Division	Barbara A. Langhenry Chief Counsel	216.664.2800	216.664.2663
Civil Division	Richard F. Horvath Chief Corporate Counsel	216.664.2800	216.664.2663
Civil Division	Thomas J. Kaiser Chief Trial Counsel	216.664.2800	216.664.2663
Civil Division	Joseph F. Scott Chief Assistant Director of Law Litigation	216.664.2800	216.664.2663
Civil Division	Harold A. Madorsky Chief Assistant Director of Law Operations and Sustainability	216.664.2800	216.664.2663
Civil Division	Michelle R. Comer Chief Assistant Director of Law Code Enforcement	216.664.2800	216.664.2663
Civil Division	Ronda G. Curtis Chief Assistant Director of Law Legislation and Finance	216.664.2800	216.664.2663
Civil Division	Richard Bertovich Chief Assistant Director of Law Real Estate and Development	216.664.2800	216.664.2663
Civil Division	William Menzalone	216.664.2800	216.664.2663

Department of Law

Barbara A. Langhenry, Director
 501 Lakeside Ave., Room 105
 Cleveland, Ohio 44114

P: 216.664.2800

F: 216.664.2663

Relay Service: 711

Send Email

Mission Statement

Committed to providing
 quality legal services to
 the City of Cleveland.

- Law Department

City of Cleveland :: Contact List

Page 2 of 2

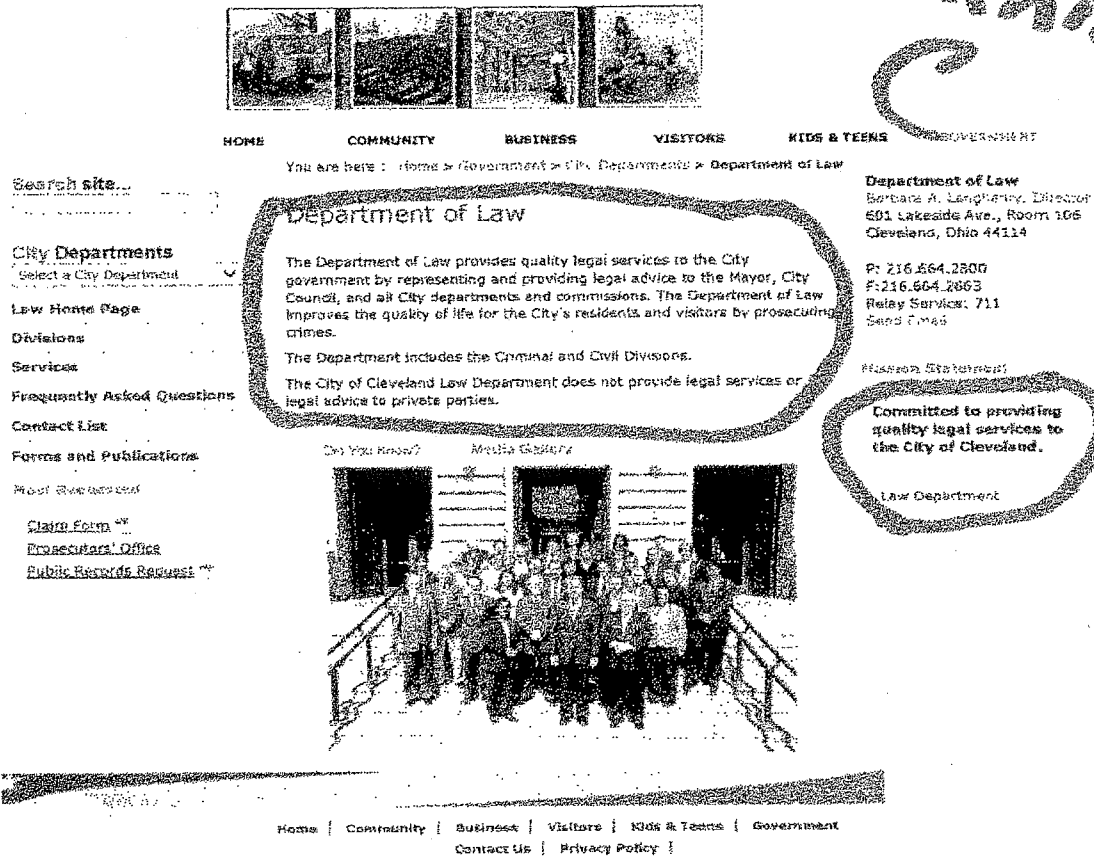
Chief Assistant
Director of Law
Public Safety
Kim Roberson
Public Records
Request Administrator 216.664.2772 216.664.2663
Send Email

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City of Cleveland :: Department of Law

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Exhibit



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Department of Law

The Department of Law provides quality legal services to the City government by representing and providing legal advice to the Mayor, City Council, and all City departments and commissions. The Department of Law improves the quality of life for the City's residents and visitors by prosecuting crimes.

The Department includes the Criminal and Civil Divisions.

The City of Cleveland Law Department does not provide legal services or legal advice to private parties.

Department of Law
Barbara A. Longberry, Director
601 Lakeside Ave., Room 106
Cleveland, Ohio 44114

P: 216.664.2800
F: 216.664.2663
Relay Service: 711
Send Email

Mission Statement

Committed to providing quality legal services to the City of Cleveland.

Law Department

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Certificate of Service

This is to certify, that a true and exact copy of the foregoing has been duly served upon the following by ordinary U. S. Mail, postage prepaid, this 15th day of April, 2014.

CLEVELAND BRANCH NAACP
C/O REV. HILTON O. SMITH, PRES.
7100 EUCLID AVENUE
CLEVELAND, OHIO 44103
(JOINDER)

CITY OF EAST CLEVELAND, OHIO
C/O MAYOR GARY NORTON JR
14340 EUCLID AVE
EAST CLEVELAND, OHIO 44112
(JOINDER)

EAST CLEVELAND CLERK OF COURT
C/O WENDY HOWARD
14340 EUCLID AVE
EAST CLEVELAND, OHIO 44112
(JOINDER)

CITY OF CLEVELAND OHIO AND
C/O MAYOR FRANK G. JACKSON
601 LAKESIDE AVE
CLEVELAND, OHIO 44114
(JOINDER)

CLEVELAND CLERK OF COURT
C/O EARLE B. TURNER
JUSTICE CENTER – LEVEL 2
1200 ONTARIO STREET
CLEVELAND, OHIO, 44113
(JOINDER)

XEROX CORPORATION
C/O CEO, URSULA M. BURNS
AND DIR. KEVIN LAFEVER
45 GLOVER AVENUE
NORWALK, CT 06856-4505
(DEFENDANT)

AMERICAN TRAFFIC SOLUTIONS
aka: ATS, AND CEO JAMES D. TUTON
AND, EXE V P ADAM E. TUTON
1330 W. SOUTHERN AVENUE
TEMPLE, AZ. 85282
(DEFENDANT)

BARBARA A. LANGHENRY, AND,
JOHN P. L. MILLS, AND, RICHARD
F. HORVATH, AND, JOSEPH F. SCOTT,
AND, HAROLD A. MADORSKY, AND,
MICHELE R. COMER, AND, RONDA G.
CURTIS, AND, RICHARD, BERTOVICH,
AND, WILLIAM MENZALORA, AND,
KIM ROBERSON, AND, VICTOR R. PEREZ,
AND, KIMBERLY G. BARNETT, AND,
CYNTHIA LIS, AND THOMAS KAISER,
AND RHONDA R. SMITH, AND, ALL
ASSOCIATED UNKNOWN PERSONS OF
THE LAW DEPT OF CITY OF CLEVELAND
C/O Barbara A Langhenry
601 LAKESIDE AVE., ROOM 106
CLEVELAND, OHIO 44114
(DEFENDANTS)

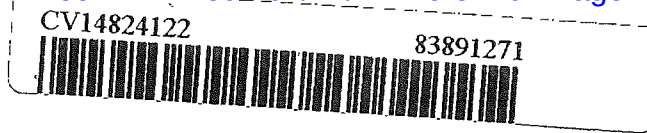
BLACK ON BLACK CRIME INC
C/O FOUNDER, ART MCKOY
14660 EUCLID AVENUE
EAST CLEVELAND, OHIO 44112
(Plaintiff)

PEACE IN THE HOOD, AND
THE COALITION FOR A BETTER LIFE
C/O CEO, KHALID SAMAD
YORK M. T. BUILDING
13512 KINMAN RD
CLEVELAND, OHIO 44120
(Plaintiff)

OPPRESSED PEOPLES NATION
C/O CHAIRMAN KEVON SMITH
14660 EUCLID AVENUE
EAST CLEVELAND, OHIO 44112
(Plaintiff)



TUA Help Save East Cleveland Project
10801 Union Avenue
Cleveland, Ohio 44105
Ph: 216-543-1817
Plaintiff/ProSe



FILED

1 2014 APR 16 A 3:03

WINDOW 4
CLERK OF COURTS
CUYAHOGA COUNTY

COURT OF COMMON PLEAS
CUYAHOGA COUNTY, OHIO

JUDGE: CASSANDRA
COLLIER-WILLIAMS

TUA HELP SAVE EAST CLEVELAND PROJECT
(PLAINTIFF)


CASE NO: CV 14 824122

VS

XEROX CORPORATION
(DEFENDANT)

PLAINTIFF TUA HELP SAVE EAST
CLEVELAND PROJECT'S NOTICE
OF DEMAND FOR TRIAL BY JURY
PURSUANT TO RULE 38.B.

Plaintiff hereby give notice of demand for trial by jury.



TUA Help Save East Cleveland Project
10801 Union Avenue
Cleveland, Ohio 44105
Ph: 216-543-1817
Plaintiff/ProSe

Certificate of Service

This is to certify, that a true and exact copy of the foregoing has been duly served upon the following by ordinary U. S. Mail, postage prepaid, this 14th day of April, 2014.

CLEVELAND BRANCH NAACP
C/O REV. HILTON O. SMITH, PRES.
7100 EUCLID AVENUE
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(JOINDER)

CITY OF EAST CLEVELAND, OHIO
C/O MAYOR GARY NORTON JR
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EAST CLEVELAND, OHIO 44112
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C/O WENDY HOWARD
14340 EUCLID AVE
EAST CLEVELAND, OHIO 44112
(JOINDER)

CITY OF CLEVELAND OHIO AND
C/O MAYOR FRANK G. JACKSON
601 LAKESIDE AVE
CLEVELAND, OHIO 44114
(JOINDER)

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C/O FOUNDER, ART MCKOY
14660 EUCLID AVENUE
EAST CLEVELAND, OHIO 44112
(Plaintiff)

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C/O CEO, KHALID SAMAD
YORK M. T. BUILDING
13512 KINSMAN RD
CLEVELAND, OHIO 44120
(Plaintiff)

CLEVELAND CLERK OF COURT
C/O EARLE B. TURNER
JUSTICE CENTER - LEVEL 2
1200 ONTARIO STREET
CLEVELAND, OHIO, 44113
(JOINDER)

XEROX CORPORATION
C/O CEO, URSULA M. BURNS
AND DIR. KEVIN LAFEVER
45 GLOVER AVENUE
NORWALK, CT 06856-4505
(DEFENDANT)

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aka: ATS, AND CEO JAMES D. TUTON
AND, EXE V P ADAM E. TUTON
1330 W. SOUTHERN AVENUE
TEMPLE, AZ. 85282
(DEFENDANT)

OPPRESSED PEOPLES NATION
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14660 EUCLID AVENUE
EAST CLEVELAND, OHIO 44112
(Plaintiff)



TUA Help Save East Cleveland Project
10801 Union Avenue
Cleveland, Ohio 44105
Ph: 216-543-1817
Plaintiff/ProSe

IN THE COURT OF COMMON PLEAS
CUYAHOGA COUNTY, OHIO

FILED
2014 APR -3 P 3:03
CLERK OF COURTS
CUYAHOGA COUNTY

TUA HELP SAVE EAST CLEVELAND
PROJECT (AKA) PASTOR A.J. THOMPSON

CASE NO. CV 14-824122

PLAINTIFF

JUDGE COLLIER-WILLIAMS

vs.

XEROX CORP., et al

DEFENDANTS

CV14824122

83716150



CITY OF CLEVELAND'S MOTION FOR MORE DEFINITE STATEMENT

Defendant City of Cleveland ("City" or "Defendant") respectfully moves this Court under Ohio Civ. R. 12(E) to require Plaintiff TUA Help Save East Cleveland Project (AKA) Pastor A.J. Thompson ("Plaintiff") to supply a more definite statement of its claim or claims against the Defendant so the City may reply to those allegations. A motion for a more definite statement under Rule 12(e) is appropriate where a pleading is "so vague or ambiguous that a party cannot reasonably be required to frame a responsive pleading."¹ The moving party must state the defects in the pleading and the details desired.²

Plaintiff's "Complaint for De-Activation and/or Removal All [sic] Unconstitutional Automated Camera Civil Traffic Enforcement Systems In The Cities of Cleveland Ohio

¹ Ohio. Civ. R. 12(e).

² *Id.*

and The City of East Cleveland OH and For Defendant [sic] to Pay Restitution for Damages for Hardship / Deterance [sic] of Business and Oppression Caused by Defendants to Plaintiff and to Poor and Minority Residents in These Cities" is difficult to comprehend. The complaint does not set forth any facts consistent with the prima facie claims of declaratory judgment, class action, negligence, injunction, or intentional tort. Plaintiff's complaint is a narrative of legal conclusions under state and federal law, as well as criminal and civil law, and lacks any factual allegations that support the legal claims. Plaintiff does not name any individuals or actors in this complaint or indicate *where or when these alleged actions occurred*. It is even unclear whether this matter is proceeding on behalf of an organization or an individual.

Plaintiff names two out-of-state corporations (Defendants Xerox and American Traffic Solutions) without any indication of how or why the Court has personal and/or subject matter jurisdiction over these defendants. Furthermore, Plaintiff does not allege any claims against four of the eight defendants at all, and has combined its pleading with a motion for joinder under Civ. R. 19. The Complaint also fails to set forth any federal or state statute that is a basis for the Plaintiff's restitution, or what amount of restitution is sought. Other allusions to civil rights violations are inserted throughout the complaint but never explained. The First and Fourteenth Amendments to the U.S. Constitution are quoted verbatim with no further explanation or context within the complaint. The City is unable to frame a responsive pleading because of the vagueness of Plaintiff's allegations and overall disorganized structure of the document.

Defendant City of Cleveland respectfully requests that the Court require Plaintiff to provide a more definite statement before the any Party is required to respond to this

pleading. If Plaintiff is unable to make a responsive pleading, the City requests that Plaintiff's complaint be dismissed, with prejudice, at Plaintiff's cost. Specifically, the City requests the Court to order Plaintiff to provide a more definite statement of the Complaint as follows:

1. Specifically identify what alleged actions or omissions involve the named Defendants, separately for each cause of action, and on an-element-by-element basis;
2. Specifically identify where and when such actions or omissions took place;
3. Identify how Plaintiff was damaged by such actions or omissions; and
4. State the relief sought.

Respectfully submitted,

BARBARA A. LANGHENRY
Director of Law

By:


JOHN P. L. MILLS (0086253)
Assistant Director of Law
City Hall—Room 106
601 Lakeside Avenue
Cleveland, Ohio 44114-1077
Phone (216) 664-2685
Fax (216) 664-2663
Jmills@city.cleveland.oh.us
Attorney for Defendant City of Cleveland

CERTIFICATE OF SERVICE

A true copy of the attached Motion for More Definite Statement was served by regular U.S. mail this 3rd day of April, 2014 upon all counsel of record.


John Mills (0086253)

FILED

2014 APR 16 A 3:02

WINDOW 4
CLERK OF COURTS
CUYAHOGA COUNTY



COURT OF COMMON PLEAS
CUYAHOGA COUNTY, OHIO

JUDGE: CASSANDRA
COLLIER-WILLIAMS

TUA HELP SAVE EAST CLEVELAND PROJECT
(PLAINTIFF)

CASE NO: CV 14 824122

VS

XEROX CORPORATION
(DEFENDANT)

PLAINTIFF TUA HELP SAVE EAST
CLEVELAND PROJECT'S MOTION
TO DENY CITY OF CLEVELAND'S
MOTION FOR MORE DEFINITE
STATEMENT

Plaintiff respectfully motion for this Court to deny City of Cleveland's motion for more definite statement, because City of Cleveland is not named a Defendant in this complaint, nor is there any allegations against the City for it to reply to. The City of Cleveland was captioned as a joind Plaintiff necessary for adjudication only in this case. Furthermore because City of Cleveland has not filed any refusal to be joind Plaintiff/ answer accordance with Ohio Rules of Civil 7.A., it has not been declared a Defendant, nor have Plaintiff had any reason to make such request. City of Cleveland's motion should also and therefore be denied because it seems geared toward defending the Defendants Xerox and American Traffic Solutions instead of defending the People, and upholding the Constitution and restoring due process on behalf of the people. The City's Law Dept. have posted on its webpage "*The City of Cleveland Law Department does not provide legal services or legal advice to private parties*" (see exhibit A attached); Xerox, and American Traffic Solutions are not entities of the City of Cleveland and are actually two separate private parties.

If Cleveland had needed clarity in order to assume their role a joinded Plaintiff they could simply reach and establish communication with TUA Help Save East Cleveland Project, as we attempted to.

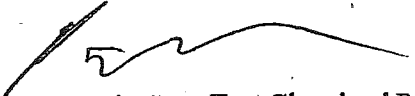

TUA Help Save East Cleveland Project
10801 Union Avenue Cleveland, Ohio 44105
Ph: 216-543-1817
Plaintiff/ProSe

EXHIBIT E

C

City of Cleveland :: Department of Law

Page 1 of 1

Exhibit A

Department of Law

The Department of Law provides quality legal services to the City government, its departments and privately held entities in the Mayor, City Council, and all City departments and organizations. The Department of Law ensures the quality of the legal services provided to the City's residents and visitors by providing services.

The Department ensures the highest quality of services.

The City of Cleveland's Law Department does not provide legal services to legal entities or private parties.

Department of Law

601 Lakeside Ave., Room 105
Cleveland, OH 44114

1-216-464-3500
1-216-464-3600
citylaw@cityofcleveland.org

Committed to providing quality legal services to the City of Cleveland.

Law Department

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Certificate of Service

This is to certify, that a true and exact copy of the foregoing has been duly served upon the following by ordinary U. S. Mail, postage prepaid, this 14th day of April, 2014.

CLEVELAND BRANCH NAACP
C/O REV. HILTON O. SMITH, PRES.
7100 EUCLID AVENUE
CLEVELAND, OHIO 44103
(JOINDER)

CITY OF EAST CLEVELAND, OHIO
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EAST CLEVELAND, OHIO 44112
(JOINDER)

EAST CLEVELAND CLERK OF COURT
C/O WENDY HOWARD
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EAST CLEVELAND, OHIO 44112
(JOINDER)

CITY OF CLEVELAND OHIO AND
C/O MAYOR FRANK G. JACKSON
601 LAKESIDE AVE
CLEVELAND, OHIO 44114
(JOINDER)

BLACK ON BLACK CRIME INC
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14660 EUCLID AVENUE
EAST CLEVELAND, OHIO 44112
(Plaintiff)


PEACE IN THE HOOD, AND
THE COALITION FOR A BETTER LIFE
C/O CEO, KHALID SAMAD
YORK M. T. BUILDING
13512 KINMAN RD
CLEVELAND, OHIO 44120
(Plaintiff)

CLEVELAND CLERK OF COURT
C/O EARLE B. TURNER
JUSTICE CENTER - LEVEL 2
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(JOINDER)

XEROX CORPORATION
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AND DIR. KEVIN LAFEVER
45 GLOVER AVENUE
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(DEFENDANT)

AMERICAN TRAFFIC SOLUTIONS
aka: ATS, AND CEO JAMES D. TUTON
AND, EXE V P ADAM E. TUTON
1330 W. SOUTHERN AVENUE
TEMPLE, AZ. 85282
(DEFENDANT)

OPPRESSED PEOPLES NATION
C/O CHAIRMAN KEVON SMITH
14660 EUCLID AVENUE
EAST CLEVELAND, OHIO 44112
(Plaintiff)


TUA Help Save East Cleveland Project
10801 Union Avenue
Cleveland, Ohio 44105
Ph: 216-543-1817
Plaintiff/ProSe



83871049

**IN THE COURT OF COMMON PLEAS
CUYAHOGA COUNTY, OHIO**

TUA HELP SAVE EAST CLEVELAND PROJECT
Plaintiff

XEROX CORPORATION, ET AL
Defendant

Case No: CV-14-824122

Judge: CASSANDRA COLLIER-WILLIAMS

JOURNAL ENTRY

DEFENDANT CITY OF CLEVELAND OHIO MOTION FOR MORE DEFINITE STATEMENT, FILED 04/03/2014, IS UNOPPOSED AND GRANTED. PLAINTIFF SHALL FILE AN AMENDED COMPLAINT BY NO LATER THAN 04/28/2014 SETTING FORTH: (1) WHICH CAUSE OR CAUSES OF ACTION ARE ASSERTED AGAINST EACH DEFENDANT; (2) WHAT FACTUAL ALLEGATIONS FORM THE BASIS OF EACH CLAIM AGAINST EACH DEFENDANT; (3) THE LEGAL THEORY UPON WHICH PLAINTIFF ASSERTS LIABILITY AGAINST EACH DEFENDANT, IN LINE WITH THE FACTUAL ALLEGATIONS; AND (4) THE RELIEF SOUGHT AS TO EACH CAUSE OF ACTION. FAILURE TO COMPLY WITH THIS ORDER MAY RESULT IN DISMISSAL WITHOUT PREJUDICE FOR FAILURE TO PROSECUTE.

SO ORDERED.

Judge Signature

04/17/2014

EXHIBIT F

04/16/2014

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04/17/2014 15:56:26
ANDREA F. ROCCO, CLERK



83914988

**IN THE COURT OF COMMON PLEAS
CUYAHOGA COUNTY, OHIO**

TUA HELP SAVE EAST CLEVELAND PROJECT
Plaintiff

XEROX CORPORATION, ET AL
Defendant

Case No: CV-14-824122

Judge: CASSANDRA COLLIER-WILLIAMS

JOURNAL ENTRY

PLAINTIFF TUA HELP SAVE EAST CLEVELAND PROJECT'S MOTION TO DENY CITY OF CLEVELAND'S MOTION FOR MORE DEFINITE STATEMENT, FILED 04/16/2014, IS DENIED.

SO ORDERED.

Judge Signature

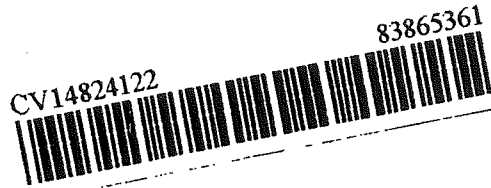
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ANDREA F. ROCCO, CLERK

Page 1 of 1

EXHIBIT G



FILED

1 2014 APR 16 A 3:01

**COURT OF COMMON PLEAS
CUYAHOGA COUNTY, OHIO**

WINDOW 4
CLERK OF COURTS
CUYAHOGA COUNTY

**JUDGE: CASSANDRA
COLLIER-WILLIAMS**

**TUA HELP SAVE EAST CLEVELAND PROJECT
(PLAINTIFF)**

CASE NO: CV 14 824122

VS

**XEROX CORPORATION
(DEFENDANT)**

**PLAINTIFFS MOTION FOR
INJUNCTION TO RESTRAIN
DEFENDANTS FROM USE OF
AUTOMATED CAMERA CIVIL
TRAFFIC ENFORCEMENTS
SYSTEMS AND TO COMPEL
DEFENDANTS TO DEACTIVATE
AND/OR REMOVE THEM**

Pursuant to *Ohio Rules of Civil Procedure 65.(A)* Plaintiff motion for injunction immediately restraining Defendants from operational use of and from profit of Automated Camera Civil Traffic Enforcement Systems and Devices within the cities of Cleveland and East Cleveland, as such have already been ruled unconstitutional in interference with and disrupt "Due Process" and "Civil Rights" (*Jodka v. Cleveland*, 2014-Ohio-208). Because immediate and irreparable injury, loss or damage will result to the applicant before the adverse party or his attorney can be heard in opposition, Plaintiff respectfully request that this injunction be granted by this court?

In accordance with *Ohio Revised Code 2307.011 Civil action definitions, the U.S. Bill of Rights; Amendment I*, and *Jodka v. Cleveland*, 2014-Ohio-208 Plaintiff motion for injunction compelling ordering Defendants to immediate deactivate and/ or remove all of Defendants' Automated Camera Civil Traffic Enforcement Systems and devices that issue traffic citation or are related to the issuance thereof, from the Cities of Cleveland Ohio and East Cleveland Ohio without any penalties, charges and/or cost whatsoever toward or against either these cities, nor any of their entities, nor any Plaintiff in this case, joined or otherwise; because continued operational use of Defendants' Automated Camera Civil Traffic Enforcement Systems and Devices is a perpetual violation of the Civil Rights of every person living in and traveling through those Cities.

Furthermore in accordance to *Jodka v. Cleveland*, 2014-Ohio-208. Journalize January 23rd 2014 use of Defendants' systems & devices were ruled unconstitutional, which in simple terms means wrong and unlawful; therefore these Defendants along with the City of Cleveland and the City of East Cleveland should have complied with *Jodka v. Cleveland*, 2014-Ohio-208. And immediately ceased all use of all Automated Camera Civil Traffic Enforcement Systems without the necessity of directives from the Court, but they did not.

Therefore Plaintiff respectfully motion for injunction ordering the Defendants with the Cities of Cleveland and East Cleveland to coordinate and immediately deactivate and/or remove from service all Automated Camera Civil Traffic Enforcement Systems to restore Civil Order and Due Process in that area be granted by this Court.



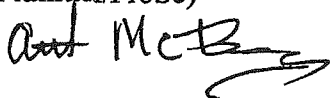
TUA Help Save East Cleveland Project

10801 Union Avenue

Cleveland, Ohio 44105

Ph: 216-543-1817

(Plaintiff/ProSe)



BLACK ON BLACK CRIME INC

C/O FOUNDER, ART MCKOY

14660 EUCLID AVENUE

EAST CLEVELAND, OHIO 44112

Ph:

(PLAINTIFF/JOINDER)



PEACE IN THE HOOD, AND

THE COALITION FOR A BETTER LIFE

C/O CEO, KHALID SAMAD

YORK M. T. BUILDING

13512 KINSMAN RD

CLEVELAND, OHIO 44120

Ph:

(PLAINTIFF/JOINDER)

OPPRESSED PEOPLES NATION

C/O CHAIRMAN KEVON SMITH

14660 EUCLID AVENUE

EAST CLEVELAND, OHIO 44112

Ph:

(PLAINTIFF/JOINDER)

Certificate of Service


This is to certify, that a true and exact copy of the foregoing has been duly served upon the following by ordinary U. S. Mail, postage prepaid, this 14th day of April, 2014.


CLEVELAND BRANCH NAACP
C/O REV. HILTON O. SMITH, PRES.
7100 EUCLID AVENUE
CLEVELAND, OHIO 44103
(JOINDER)

CITY OF EAST CLEVELAND, OHIO
C/O MAYOR GARY NORTON JR
14340 EUCLID AVE
EAST CLEVELAND, OHIO 44112
(JOINDER)

EAST CLEVELAND CLERK OF COURT
C/O WENDY HOWARD
14340 EUCLID AVE
EAST CLEVELAND, OHIO 44112
(JOINDER)

CITY OF CLEVELAND OHIO AND
C/O MAYOR FRANK G. JACKSON
601 LAKESIDE AVE
CLEVELAND, OHIO 44114
(JOINDER)


BLACK ON BLACK CRIME INC
C/O FOUNDER, ART MCKOY
14660 EUCLID AVENUE
EAST CLEVELAND, OHIO 44112
(Plaintiff)



PEACE IN THE HOOD, AND
THE COALITION FOR A BETTER LIFE
C/O CEO, KHALID SAMAD
YORK M. T. BUILDING
13512 KINSMAN RD
CLEVELAND, OHIO 44120
(Plaintiff)

CLEVELAND CLERK OF COURT
C/O EARLE B. TURNER
JUSTICE CENTER – LEVEL 2
1200 ONTARIO STREET
CLEVELAND, OHIO, 44113
(JOINDER)

XEROX CORPORATION
C/O CEO, URSULA M. BURNS
AND DIR. KEVIN LAFEVER
45 GLOVER AVENUE
NORWALK, CT 06856-4505
(DEFENDANT)

AMERICAN TRAFFIC SOLUTIONS
aka: ATS, AND CEO JAMES D. TUTON
AND, EXE V P ADAM E. TUTON
1330 W. SOUTHERN AVENUE
TEMPLE, AZ. 85282
(DEFENDANT)

OPPRESSED PEOPLES NATION
C/O CHAIRMAN KEVON SMITH
14660 EUCLID AVENUE
EAST CLEVELAND, OHIO 44112
(Plaintiff)


TUA Help Save East Cleveland Project
10801 Union Avenue
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Ph: 216-543-1817
Plaintiff/ProSe



83870236

**IN THE COURT OF COMMON PLEAS
CUYAHOGA COUNTY, OHIO**

TUA HELP SAVE EAST CLEVELAND PROJECT
Plaintiff

XEROX CORPORATION, ET AL
Defendant

Case No: CV-14-824122

Judge: CASSANDRA COLLIER-WILLIAMS

JOURNAL ENTRY

PLAINTIFF'S TUA HELP SAVE EAST CLEVELAND PROJECT MOTION FOR INJUNCTION TO RESTRAIN DEFENDANTS FROM USE OF AUTOMATED CAMERA CIVIL TRAFFIC ENFORCEMENT'S SYSTEMS AND TO COMPEL DEFENDANTS TO DEACTIVATE AND/OR REMOVE THEM, FILED 04/16/2014, IS DENIED. THE COURT FINDS THAT PLAINTIFF HAS NOT COMPLIED WITH CIV. R. 65.

SO ORDERED.

Judge Signature

04/17/2014

EXHIBIT I

04/16/2014

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04/17/2014 15:56:17
ANDREA F. ROCCO, CLERK

CV14824122

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FILED

2014 APR 16 A 3:02

WINDOW 4
CLERK OF COURTS
CUYAHOGA COUNTY

**COURT OF COMMON PLEAS
CUYAHOGA COUNTY, OHIO**

**JUDGE: CASSANDRA
COLLIER-WILLIAMS**

**TUA HELP SAVE EAST CLEVELAND PROJECT
(PLAINTIFF)**

CASE NO: CV 14 824122

VS

**XEROX CORPORATION
(DEFENDANT)**

**PLAINTIFF
PEACE IN THE HOOD AND
THE COALITION FOR A BETTER LIFE'S
ANSWER AND NOTICE TO
CONCUR AS JOIND PLAINTIFF**

Herewith Peace In The Hood concur with this the complaints outlines in this case and acknowledge itself Joind as a Plaintiff necessary to arrive at justice and fairness, and protect and preserve "Due Process", our Civil Rights and the "Civil Rights" of "The People.

PEACE IN THE HOOD, AND
THE COALITION FOR A BETTER LIFE
C/O CEO, KHALID SAMAD
YORK M. T. BUILDING
13512 KINMAN RD
CLEVELAND, OHIO 44120
Ph: 216-508-4053
(PLAINTIFF)

Certificate of Service

This is to certify, that a true and exact copy of the foregoing has been duly served upon the following by ordinary U. S. Mail, postage prepaid, this 9th day of April, 2014.

CLEVELAND BRANCH NAACP
C/O REV. HILTON O. SMITH, PRES.
7100 EUCLID AVENUE
CLEVELAND, OHIO 44103
(JOINDER)

CITY OF EAST CLEVELAND, OHIO
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EAST CLEVELAND CLERK OF COURT
C/O WENDY HOWARD
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C/O MAYOR FRANK G. JACKSON
601 LAKESIDE AVE
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(JOINDER)

TUA Help Save East Cleveland Project
10801 Union Avenue
Cleveland, Ohio 44105
Plaintiff/ProSe


CLEVELAND CLERK OF COURT
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JUSTICE CENTER - LEVEL 2
1200 ONTARIO STREET
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(JOINDER)

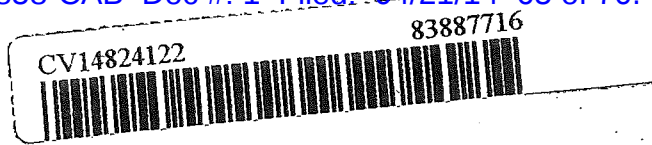
XEROX CORPORATION
C/O CEO, URSULA M. BURNS
AND DIR. KEVIN LAFEVER
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(DEFENDANT)

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TEMPLE, AZ. 85282
(DEFENDANT)

OPPRESSED PEOPLES NATION
C/O CHAIRMAN KEVON SMITH
14660 EUCLID AVENUE
EAST CLEVELAND, OHIO 44112
(Plaintiff)

BLACK ON BLACK CRIME INC
C/O FOUNDER, ART MCKOY
14660 EUCLID AVENUE
EAST CLEVELAND, OHIO 44112
(Plaintiff)


PEACE IN THE HOOD, AND
THE COALITION FOR A BETTER LIFE
C/O CEO, KHALID SAMAD
YORK M. T. BUILDING
13512 KINMAN RD
CLEVELAND, OHIO 44120
Ph: 216-508-4053
(PLAINTIFF)



FILED

2014 APR 16 A 3:01

**COURT OF COMMON PLEAS
CUYAHOGA COUNTY, OHIO**

WINDOW 4
CLERK OF COURTS
CUYAHOGA COUNTY

**JUDGE: CASSANDRA
COLLIER-WILLIAMS**

**TUA HELP SAVE EAST CLEVELAND PROJECT
(PLAINTIFF)**

CASE NO: CV 14 824122

VS

**XEROX CORPORATION
(DEFENDANT)**

**PLAINTIFF
BLACK ON BLACK CRIME INC'S
ANSWER AND NOTICE TO
CONCUR AS JOIND PLAINTIFF**

Herewith Black On Black Crime Inc concur with this the complaints outlines in this case and acknowledge itself Joind as a Plaintiff necessary to arrive at justice and fairness, and protect and preserve "Due Process", our Civil Rights and the "Civil Rights" of "The People."

A handwritten signature in cursive script that reads "Art Mckoy".

**BLACK ON BLACK CRIME INC
C/O FOUNDER, ART MCKOY
14660 EUCLID AVENUE
EAST CLEVELAND, OHIO 44112
Ph: 216- 253-4070
(PLAINTIFF)**

A handwritten mark resembling a stylized letter 'C' or a checkmark, located in the bottom right corner of the page.

Certificate of Service

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C/O MAYOR FRANK G. JACKSON
601 LAKESIDE AVE
CLEVELAND, OHIO 44114
(JOINDER)

TUA Help Save East Cleveland Project
10801 Union Avenue
Cleveland, Ohio 44105
Plaintiff/ProSe

CLEVELAND CLERK OF COURT
C/O EARLE B. TURNER
JUSTICE CENTER – LEVEL 2
1200 ONTARIO STREET
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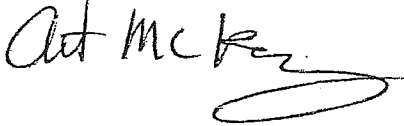
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C/O CEO, URSULA M. BURNS
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(DEFENDANT)

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EAST CLEVELAND, OHIO 44112
(Plaintiff)

PEACE IN THE HOOD, AND
THE COALITION FOR A BETTER LIFE
C/O CEO, KHALID SAMAD
YORK M. T. BUILDING
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CLEVELAND, OHIO 44120
(Plaintiff)

BLACK ON BLACK CRIME INC
C/O FOUNDER, ART MCKOY
14660 EUCLID AVENUE
EAST CLEVELAND, OHIO 44112
Ph: 216-253-4070
(Plaintiff)

A handwritten signature in black ink, appearing to read "Art McKay", with a large, stylized flourish at the end.



FILED

2014 APR 16 A 9:03

WINDOW 4
CLERK OF COURTS
CUYAHOGA COUNTY

**COURT OF COMMON PLEAS
CUYAHOGA COUNTY, OHIO**

**JUDGE: CASSANDRA
COLLIER-WILLIAMS**

**TUA HELP SAVE EAST CLEVELAND PROJECT
(PLAINTIFF)**

CASE NO: CV 14 824122

VS

**XEROX CORPORATION
(DEFENDANT)**

**PLAINTIFF TUA HELP SAVE EAST
CLEVELAND PROJECT'S MOTION TO
CHANGE CASE MANAGEMENT CON-
FERENCE FROM BY PHONE TO BY
APPEARANCE.**

Now Come Plaintiff respectfully motioning for this Court to change the Case Management Conference set for May 5th, 2014 at 11:00 AM from by phone to by appearance in the interest of fairness and justice.

**TUA Help Save East Cleveland Project
10801 Union Avenue
Cleveland, Ohio 44105
Ph: 216-543-1817
Plaintiff/ProSe**

EXHIBIT L

C

Certificate of Service

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(JOINDER)

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14660 EUCLID AVENUE
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(Plaintiff)

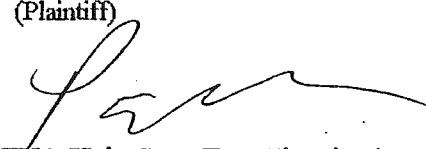
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YORK M. T. BUILDING
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CLEVELAND, OHIO 44120
(Plaintiff)

CLEVELAND CLERK OF COURT
C/O EARLE B. TURNER
JUSTICE CENTER - LEVEL 2
1200 ONTARIO STREET
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EAST CLEVELAND, OHIO 44112
(Plaintiff)



TUA Help Save East Cleveland Project
10801 Union Avenue
Cleveland, Ohio 44105
Ph: 216-543-1817
Plaintiff/ProSe



83914273

**IN THE COURT OF COMMON PLEAS
CUYAHOGA COUNTY, OHIO**

TUA HELP SAVE EAST CLEVELAND PROJECT
Plaintiff

XEROX CORPORATION, ET AL
Defendant

Case No: CV-14-824122

Judge: CASSANDRA COLLIER-WILLIAMS

JOURNAL ENTRY

PLAINTIFF TUA HELP SAVE EAST CLEVELAND PROJECT'S MOTION TO CHANGE CASE MANAGEMENT CONFERENCE FROM BY PHONE TO BY APPEARANCE, FILED 04/16/2014, IS DENIED.

SO ORDERED.

Judge Signature

04/18/2014

04/18/2014

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